

## REMARKS

Claims 1-4 and 6-25 are pending in the application. Claims 1, 10, 12, 18, 22, 24 and 25 have been amended. Claim 5 has been canceled without prejudice or disclaimer. Reconsideration of this application is respectfully requested.

The Office Action objects to claim 10 on the ground that "check" should be "check-in". Claim 10 has been amended by changing "check" to "check-in". Accordingly, it is submitted that the objection to claim 10 is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 1-8, 12-16 and 18-25 under 35 U.S.C. 102(b) as anticipated by U.S. Patent No. 6,272,678 to Imachi et al., hereafter Imachi.

This rejection is obviated by the amendment to independent claims 1, 12, 18, 22, 24 and 25. Independent claims 1, 18, 22, 24 and 25 have been amended to recite the operation of "a source control system on a computer that is coupled via a network to a controller that communicates with one or more devices to provide process control". These claims have been further amended to recite that an object or control strategy of the source control system is "loadable to said controller to provide said process control". Independent claim 12 has been similarly amended.

Imachi discloses a document processing system, which does not have a controller that communicates with one or more devices to provide process control, wherein an object or control strategy of the source control system is "loadable to said controller to provide said process control". The Examiner contends that Imachi's secondary memory units 106a – 106d are controllers. Secondary memory units 106a – 106d control only to the extent that they

respond to memory accesses to access memory locations to read and write data, but they do not communicate “with one or more devices to provide process control”. Therefore, for at least this reason, Imachi does not anticipate 12, 18, 22, 24 and 25.

For the reason set forth above, it is submitted that the rejection of claims 1-8, 12-16 and 18-25 under 35 U.S.C. 102(b) as anticipated by Imachi is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 9 and 17 under 35 U.S.C 103(a) as unpatentable over Imachi.

The Examiner’s statement that file branching is a conventional method commonly used in software configuration management systems is challenged. The Examiner’s statement that different licenses as well as installation configuration for each of Imachi’s modes could easily have been applied is also challenged. The Examiner’s reference to Cad tools and Mentor Graphics’ ModelSim product must be backed up with literature that discloses what the Examiner saying. The Examiner must cite evidence of what is regarded as well known.

For the reason set forth above in the discussion of independent claims 1 and 12, from which claims 9 and 17 depend, this rejection is obviated by the amendment to independent claims 1 and 12.

For the reason set forth above, it is submitted that the rejection of claims 9 and 17 under 35 U.S.C. 103(a) is obviated by the amendment and should be withdrawn.

The Office Action rejects claims 10 and 11 under 35 U.S.C 103(a) as unpatentable over Imachi in view of U.S Patent No. 6,115,646 to Fiszman et al., hereafter Fiszman.

For the reason set forth above in the discussion of independent claim 1, from which claims 9 and 17 depend, this rejection is obviated by the amendment to independent claim 1. Fiszman, which was cited for a different reason, does not supply the deficiency of Imachi.


With respect to claim 11, the Examiner's statement that file branching is a conventional method commonly used in software configuration management systems is challenged. The Examiner must cite evidence of what is regarded as well known.

For the reason set forth above, it is submitted that the rejection of claims 10 and 11 under 35 U.S.C. 103(a) is obviated by the amendment and should be withdrawn.

It is respectfully requested for the reasons set forth above that the objection to claim 10 be withdrawn, that the rejections under 35 U.S.C. 102(b) and 35 U.S.C. 103(a) be withdrawn, that claims 1-4 and 6-25 be allowed and that this application be passed to issue.

Respectfully Submitted,

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Paul D. Greeley

Reg. No. 31,019

Attorney for Applicant

Ohlandt, Greeley, Ruggiero & Perle, L.L.P.

One Landmark Square, 10<sup>th</sup> Floor

Stamford, CT 06901-2682

(203) 327-4500